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15 UNITED STATES BANKRUPTCY COURT
16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 In re:
18 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,
19 Debtor and
20 Debtor in Possession.

Case No. 23-30564

Chapter 11

**DECLARATION OF BARRON L.
WEINSTEIN IN SUPPORT OF MOTION
FOR AN ORDER ESTABLISHING
PROCEDURES AND AUTHORIZING
PAYMENT OF PROFESSIONAL FEES
AND EXPENSES ON A MONTHLY
BASIS**

Date: October 12, 2023
Time: 1:30 p.m.
Place: Via ZoomGov
Judge: Hon. Dennis Montali

26 I, Barron L. Weinstein, hereby declare under penalty of perjury as follows:

27 1. I am an attorney duly licensed to practice law in the State of California and a partner
28 with Weinstein & Numbers, LLP ("W&N"), proposed insurance counsel for the Roman Catholic

1 Archbishop of San Francisco, the Debtor and Debtor in Possession herein (the “Debtor” or
2 “RCASF”). If called as a witness, I would and could testify competently to the matters stated
3 herein.

4 2. This declaration is submitted in support of the Debtor’s Motion for an Order
5 Establishing Procedures and Authorizing Payment of Professional Fees and Expenses on a Monthly
6 Basis (the “Motion”).

7 3. The Debtor retained W&N as special insurance counsel. An application to approve
8 the employment of W&N has been filed with the Court.

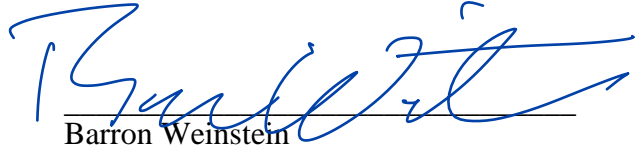
9 4. W&N is a small local Larkspur firm with only two partners. The RCASF work
10 represents a substantial amount of time spent by myself, my associates and support staff each
11 month. Having to wait months for payment will surely have a negative impact on firm cash flow.
12 We have no way of replacing that income given the amount of time being devoted to the diocesan
13 work.

14 5. As noted in the W&N employment application and my declaration in support
15 thereof (Dkts 98 and 99), SGSM has represented the RCASF on insurance issues related to the
16 current abuse claims litigation and has been working with the RCASF regarding its insurance
17 coverage for abuse claims since 2004. W&N has assisted RCASF in negotiating settlements of
18 abuse claims with funds that included funds from RCASF’s insurance carriers.

19 6. As a result of its extensive history and prepetition representation of the RCASF,
20 W&N has acquired in-depth knowledge of the Debtor’s insurance matters. W&N possesses the
21 necessary background to address the Debtor’s insurance issues related to abuse claims litigation
22 and related matters that may arise in the course of the Debtor’s Chapter 11 case. W&N is both well
23 qualified and uniquely able to act as its special insurance counsel in this Chapter 11 case in an
24 efficient and timely manner.

25 7. The amount of professional activity anticipated will be quite high each month
26 resulting in the accrual of substantial fees. W&N performed roughly 898 hours of services in 2022.
27 I expect that level of work to continue. Thus, waiting four months or more for any payment for
28 these services will cause a hardship to me and W&N. Notwithstanding this hardship, I believe that

1 W&N can respond to any reassessment of fees and expenses not ultimately approved by the Court.
2 I declare under penalty of perjury that the foregoing is true and correct. Executed on
3 September 18, 2023 at Larkspur, California.

4 
5 Barron Weinstein